



**NAVSUPPLY**

SHIP CHANDLER 4 ALL NEEDS

# Code Of Ethical Conduct

# Summary

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# PRESIDENT'S MESSAGE.



**NAVSUPPLY** was born and grew and is being consolidated, supported by the principles of Ethics, Integrity and Transparency. With this code, we intend to give even more transparency to our values and organizational culture, with the full support of the Board of Directors and Board of Executive Officers, trusting that with this Code we will direct all the internal and external decisions of our employees, service providers, suppliers and customers.

It is extremely important that all our employees and partners read, understand and practice the rules set forth herein. We count on the support of a qualified team working so that all the guidelines of this Code are fully and constantly practiced.

We count on your support to maintain a respectful, humane and healthy work environment, in accordance with the best governance and sustainability practices.

**Eduardo Bediaga**

# Introduction

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## **Who must follow the rules of this code?**

All Directors and partners, employees, outsourced workers, interns and suppliers.

## **What is the Code of Ethical Conduct for?**

So that everyone knows what they should and should not do in the company, allowing everyone to live together, within healthy limits, with respect and professionalism, all in accordance with Brazilian and foreign laws, which are applied to I work at Navsupply company.

## **And if not fulfilled?**

### **a) If employed:**

Anyone who does not comply with the rules will suffer the consequences, which can be: warning, suspension and dismissal, among other applicable sanctions.

### **b) Outsourced and suppliers.**

The outsourced or supplier that does not comply with the rules will have their case taken to the Compliance Committee for deliberation, will be notified in writing of the breached rule and may suffer the applicable sanctions, as described in the contract clauses, and may also have their contracts, temporarily or permanently.

#### 4. What should I do?

- a) Comply with schedules and tasks.
- b) Respect everyone's workspace, keeping my belongings clean and organized.
- c) Wear appropriate clothing for the work environment.
- d) Respect different opinions.
- e) Collaborate with your colleagues whenever possible and requested.
- f) Be kind and polite to everyone, regardless of position, social condition, sexual, religious or sporting option.
- g) Ensure the security of the company's data and information, disclosing them only with their express consent.

#### 5. What can't I do?

- a) Use working hours for particular tasks.
- b) Improperly use the name or logo of the company NAVSUPPLY without prior written authorization, in any type of media, including social networks.
- c) Make political propaganda during working hours, in the company environment.
- d) Request gifts, tickets, invitations or favors of any kind from suppliers.
- e) Give gifts to public agents, or offer to pay their expenses: for example, customs inspectors, ANVISA, income tax, port guard, government representatives.
- f) Doing favors in exchange for business.
- g) Discriminate people according to age, race, sex, physical characteristics.
- h) Consuming alcoholic beverages, cigarettes, including electronic cigarettes, or making use of any other licit or illicit drug within the company.
- i) Coming to work intoxicated.
- j) Use secret company information to gain advantages for themselves or other people.

# Of the company's commitments

- a) Not to work with suppliers that offer advantages or benefits of any nature to employees in exchange for advantages of any kind.
- b) Do not hire suppliers that are involved in the exploitation of child, degrading or slave labor or that degrade the environment.
- c) Establish penalties for employees who give preference to any supplier in exchange for any advantage.
- d) Provide training to employees, managers and suppliers on measures that must be taken to prevent money laundering, financing of terrorism and corruption, financial crimes, and any type of illicit act.

## Integrity Channel (Whistleblower)

In our daily lives, we are all subject to one or more ethical, moral and controversial dilemmas.

Whenever this occurs, ask yourself:

“Is this fact or decision that I witnessed in accordance with the laws, norms and/or personal and/or company values?”

If this reflection generates discomfort, or even a doubt, use the Integrity Channel (Complaint) to resolve this discomfort or doubt.

NAVSUPPLY guarantees that your question will be treated with anonymity, regarding the information received and with confidentiality, regarding the identities (yours and whoever is involved).

NAVSUPPLY also guarantees that there will be no act of retaliation or punishment against the professional or third party who makes reports in good faith.

# ATTACHMENT

## **Declaration of Science, Acceptance and Commitment to the NAVSUPPLY Code of Ethics and Conduct.**

I declare on this date that:

- 1- Received, read and understood the NAVSUPPLY Code of Ethics and Conduct Guidelines.
- 2- I am not involved in any situation that characterizes an actual or apparent (presumed) Conflict of Interest in relation to the Code and NAVSUPPLY's activities.
- 3- I agree to immediately inform the company through my immediate Manager and/or the Integrity Channel (Whistleblower) of any situation that violates the guidelines of the Code, the laws and regulations that involve NAVSUPPLY's activities and socializing with others employees, customers, suppliers, contractors and service providers.
- 4- I confirm that I am aware of NAVSUPPLY's Principles and Values and as an employee, I am seen as a representative of the company, even outside working hours.

**Name:** \_\_\_\_\_

**Responsibility:** \_\_\_\_\_

**Place and date:** \_\_\_\_\_

**Signature:** \_\_\_\_\_